

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**ANYWHERECOMMERCE, INC.
and BBPOS LIMITED,**

Plaintiffs,

v.

**INGENICO INC., INGENICO CORP.
and INGENICO GROUP, SA,
Defendants.**

**CIVIL ACTION NO.
1:19-cv-11457-IT**

PLAINTIFFS' PROPOSED QUESTIONS FOR VOIR DIRE

Pursuant to the Court's Second Amended Procedural Order Re: Pretrial/Trial dated March 29, 2023 (Doc. No. 229), Plaintiffs AnywhereCommerce, Inc. ("AC") and BBPOS Limited ("BBPOS," and together "Plaintiffs"), by and through their undersigned counsel, Kutak Rock LLP, respectfully submit these Proposed Questions for *Voir Dire*.

PROPOSED VOIR DIRE QUESTIONS

1. Are you familiar with the Honorable Indira Talwani, or any of the other attorneys in this case, including Plaintiffs' attorneys, the law firm of Kutak Rock LLP, Oliver Griffin, Melissa Bozeman, Leland Abide, or Ricardo Cedillo of Davis, Cedillo & Mendoza, Inc.; or Defendants' attorneys, the law firm of Adler Pollock & Sheehan P.C., John Tarantino, Jeffrey Techentin, or Bart Totten?

2. The following individuals (including the parties) are possible witnesses in this matter. Do you know any of the parties or the following individuals?

- Ben Lo
- Jimmy Tang
- Will Graylin
- Christopher Rotsaert
- Victor Young
- David Szczepanski
- Michael Kron

- Ivan Zatkovich
- Steve Scherf
- Mitchell Cobrin
- Dr. Jennifer Vanderhart
- Dr. Michael Shamos

3. Have you ever worked with or done business with:

- Ingenico Group, S.A.
- Ingenico, Inc.
- BBPOS Limited
- AnywhereCommerce, Inc.

4. Have you ever served on a jury? If so, please state when, the length of your jury service, and without regard for the outcome, whether the jury ever reached a verdict.

5. Have you or any members of your family ever worked in the payments industry?

6. Are you currently employed? If yes:

- Where do you work?
- How long have you worked there?
- What is your current position?

7. Have you or any members of your family ever had an issued patent?

8. Have you ever been involved in developing technology related to accepting or processing payment card (credit or debit) transactions?

9. Have you ever had technology or an invention stolen from you?

10. Have you ever been treated unfairly in a business deal?

11. Have you ever brought a lawsuit in connection with business deal that went bad?

12. Have you ever worked as an engineer?

13. Have you or any members of your family ever been involved in a lawsuit, either as a party, witness or otherwise?

14. Is there any reason that I have not asked you about that would make it so you could not be fair and impartial to the parties on both sides of this lawsuit?

Dated: April 10, 2023.

Respectfully submitted:

KUTAK ROCK LLP

/s/ Melissa A. Bozeman

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*Attorneys for Plaintiffs / Counterclaim-
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CERTIFICATE OF SERVICE

I, Melissa A. Bozeman hereby certify that I have served a true and correct copy of the foregoing Proposed Questions for *Voir Dire* on this 10th day of April, 2023, upon all counsel of record via CM / ECF Notification.

/s/ *Melissa A. Bozeman*

Melissa A. Bozeman